## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

KNIGHTSCOPE, INC.,

Plaintiff,

v.

CAPYBARA RESEARCH, IGOR APPELBOOM, and ACCRETIVE CAPITAL LLC d/b/a BENZINGA,

Defendants.

Civil Action No. 1:23-cv-11050-DLC

**NOTICE OF MOTION** 

PLEASE TAKE NOTICE that, upon the annexed Declaration of William Santana Li, dated March 13, 2024, the exhibits annexed thereto, the Declaration of Joseph F. Rose, dated March 13, 2024, the exhibits annexed thereto, the accompanying Memorandum of Law, dated March 13, 2024, and all prior papers and proceedings had herein, Plaintiff Knightscope, Inc. ("Plaintiff") will move this Court on March 29, 2024 at 3:30 p.m. before the Honorable Denise Cote, United States District Court Judge for the Southern District of New York, in Courtroom 18B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for an order granting Plaintiff's *Ex Parte* Motion for Default Judgment against Defendant Accretive Capital LLC d/b/a Benzinga pursuant to Fed. R. Civ. P. 55(b)(2) and Local Civil Rule 55.2(b).

Dated: March 13, 2024

THE BASILE LAW FIRM P.C.

By: /s/ Joseph F. Rose

Joseph F. Rose, Esq. Waleed Amer, Esq.

390 N. Broadway, Suite 140

## Case 1:23-cv-11050-DLC Document 29 Filed 03/13/24 Page 2 of 2

Jericho, New York 11753 Tel.: (516) 455-1500 Fax: (631) 498-0478

Email: joe@thebasilelawfirm.com waleed@thebasilelawfirm.com

Attorneys for Plaintiff Knightscope, Inc.